

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

APRIL ROBLES

Plaintiff,

v.

EMINENT MEDICAL CENTER, LLC
AND EMINENT MEDICAL CENTER
OPERATING, LLC

Defendants.

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Civil Action No. 3-20-CV-01188-L

JOINT MOTION TO CONTINUE PRETRIAL DEADLINES AND
TRIAL PENDING SUMMARY JUDGMENT RULING AND
SETTLEMENT DISCUSSIONS INCLUDING POTENTIAL MEDIATION

Plaintiff and Defendants move for a continuance of pending pretrial deadlines until 30 days after this Court rules on Defendants' motion for summary judgment and a coordinate continuance of trial to allow meaningful settlement discussions, including by mediation, and would show as follows:

1. Under this Court's current scheduling order in this action, this Court set the following deadlines:

February 22, 2022 Defendants' motion for summary judgment.

August 7, 2022 settlement conference between the parties.

August 9, 2022 Rule 26 witness and exhibit disclosures and lists, joint pretrial order and suggested voir dire questions and jury charges.

August 16, 2022 objections to Rule 26 witness and exhibit disclosures and lists and jury charges.

2. Defendants' motion for summary judgment remains pending.

3. Plaintiff and Defendants have conferred and agree, based on a pre-lawsuit mediation and previous settlement discussions, that continued settlement dialogue will be more productive after knowing the extent to which Plaintiff's claims are to be tried. Additionally, the requested relief will preserve resources and promote efficiency by allowing the parties to finalize joint pretrial materials after the claims remaining for trial are determined.

4. Plaintiff and Defendants therefore respectfully request that this Court continue the pending pretrial deadlines for 30 days after this Court rules on Defendants' motion for summary judgment and also to continue trial consistent with the new pretrial deadlines. During the 30 days, Plaintiff and Defendants can have good faith settlement discussions, including by mediation, knowing the scope of any claims of Plaintiff to be tried.

WHEREFORE, Plaintiff and Defendants request that the Court grant the relief referred to in paragraph 4 and such other relief as is appropriate.

Respectfully submitted,

/s/Robert E. Goodman, Jr.

Robert E. Goodman, Jr.

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ATTORNEYS FOR DEFENDANTS

CERTIFICATE OF SERVICE

I hereby certify that the foregoing document was served on counsel of record through the electronic filing system of this Court on this the 3rd day of August 2022.

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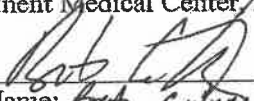
/s/ Robert E. Goodman, Jr.
Robert E. Goodman, Jr.

SIGNATURES OF PARTIES:



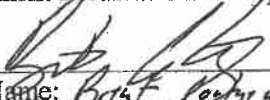
April Robles

Eminent Medical Center, LLC

By 

Name: Brett Courtney
Title: Partner

Eminent Medical Center Operating, LLC

By 

Name: Brett Courtney
Title: Partner

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